

WHITEMAN  
OSTERMAN  
& HANNA LLP

Attorneys at Law  
www.woh.com

80 State Street, 11<sup>th</sup> Floor  
Albany, New York 12207  
518.487.7600 phone  
518.487.7777 fax

Heller, Justin A.  
Partner  
518-432-3159 phone  
JHeller@woh.com

March 20, 2025

**VIA CM-ECF**

Hon. Robert E. Littlefield, Jr.  
United States Bankruptcy Court NDNY  
James T. Foley Courthouse  
445 Broadway, Suite 330  
Albany, New York 12207

**Re: Wind-Down Bottle and Packaging, Inc. (“Debtor”)  
Chapter 11; Case No.: 24-11283**

Dear Judge Littlefield:

Pursuant the *Order Authorizing the Employment of Nolan Heller Kauffman LLP as Attorneys* entered on December 19, 2024, the Court authorized the employment of Nolan Heller Kauffman LLP (“NHK”) as counsel for the Debtor (ECF No. 33, the “Retention Order”). The attorneys of NHK joined the firm of Whiteman Osterman & Hanna LLP (“WOH”) effective as of January 1, 2025. As part of this process, the undersigned obtained the requisite written consent of the Debtor for the transfer of the Debtor’s file and representation of the Debtor to WOH. Additionally, a conflicts check was performed and no connections to or conflicts with creditors or other parties in interest were identified.

As a result of NHK’s association with WOH effective January 1, 2025, it is respectfully requested that the Court enter the attached proposed order amending the Retention Order to authorize the Debtor’s employment of WOH as counsel for the Debtor effective as of January 1, 2025. The undersigned consulted with the United States Trustee prior to the filing of this letter and proposed order and the United States Trustee indicated they had no objection.

Thank you for the Court’s consideration of this request.

**WHITEMAN OSTERMAN & HANNA LLP**

*/s/ Justin A. Heller*

Justin A. Heller

cc: CM-ECF Parties